

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and)	
JOHN MEINERS, and DANIEL UMPA,)	
individually and on behalf of all others)	
similarly situated,)	
)	
Plaintiffs,)	Case No. 4:23-cv-00788-SRB
)	[Consolidated with 4:23-cv-00945-SRB]
v.)	
)	Judge Stephen R. Bough
NATIONAL ASSOCIATION OF)	
REALTORS, <i>et al.</i> ,)	
)	
Defendants)	

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO
THE KEYES COMPANY AND ILLUSTRATED PROPERTIES, LLC**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”), and defendants The Keyes Company (“Keyes”) and Illustrated Properties, LLC (“Illustrated”, and together with Keyes and Plaintiffs, the “Parties”) respectfully provide notice to the Court that Plaintiffs have reached an agreement with Keyes and Illustrated to settle all claims asserted against them in the above-captioned consolidated action as part of a proposed nationwide class settlement. The settlement was jointly negotiated with counsel for all Plaintiffs. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will promptly file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, the Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to Keyes and Illustrated to preserve the resources of Plaintiffs, Keyes, Illustrated, and the Court, and to seek preliminary and final approval of the settlement.

Dated: September 3, 2024

Respectfully submitted by:

/s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)

steve@hbsslaw.com

HAGENS BERMAN SOBOL SHAPIRO LLP

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Michael S. Ketchmark MO # 41018

Scott A. McCreight MO # 44002

Ben H. Fadler MO # 56588

KETCHMARK & MCCREIGHT

11161 Overbrook Road, Suite 210

Leawood, KS 66211

Tele: (913) 266-4500

Fax: (913) 317-5030

mike@ketchmclaw.com

smccreight@ketchmclaw.com

bfadler@ketchmclaw.com

Brandon J.B. Boulware MO # 54150

Jeremy M. Suhr MO # 60075

Erin D. Lawrence MO # 63021

BOULWARE LAW LLC

1600 Genessee, Suite 416

Kansas City, MO 64102

Tele: (816) 492-2826

Fax: (816) 492-2826

brandon@boulware-law.com

jeremy@boulware-law.com

erin@boulware-law.com

Matthew L. Dameron MO # 52093

Eric L. Dirks MO # 54921

WILLIAMS DIRKS DAMERON LLC

1100 Main Street, Suite 2600

Kansas City, MO 64105

Tele: (816) 945-7110

Fax: (816) 945-7118

matt@williamsdirks.com

dirks@williamsdirks.com

Benjamin D. Brown (*pro hac vice*)

bbrown@cohenmilstein.com

Robert A. Braun (*pro hac vice*)
rbraun@cohenmilstein.com
Brian E. Johnson (Mo. Bar. No. 64938)
BEJohnson@cohenmilstein.com
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Ave. NW, Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600

Daniel Silverman (*pro hac vice*)
dsilverman@cohenmilstein.com
COHEN MILSTEIN SELLERS & TOLL PLLC
769 Centre Street, Suite 207
Boston, MA 02130
Telephone: (617) 858-1990

Rio S. Pierce (*pro hac vice*)
riop@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000

Nathan Emmons (Mo. Bar. No. 70046)
nathane@hbsslaw.com
Jeannie Evans (*pro hac vice*)
jeannie@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
455 North Cityfront Plaza Drive, Suite 2410
Chicago, IL 60611
Telephone: (708) 628-4949

Marc M. Seltzer (*pro hac vice*)
mseltzer@susmangodfrey.com
Steven G. Sklaver (*pro hac vice*)
ssklaver@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 789-3100

Beatrice C. Franklin (*pro hac vice*)
bfranklin@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas 32nd Floor
New York, New York 10019

Telephone: (212) 336-8330

Matthew R. Berry (*pro hac vice*)

mberry@susmangodfrey.com

Floyd G. Short (*pro hac vice*)

fshort@susmangodfrey.com

Alexander W. Aiken (*pro hac vice*)

aaiken@susmangodfrey.com

SUSMAN GODFREY L.L.P.

401 Union St., Suite 3000

Seattle, Washington 98101

Telephone: (206) 516-3880

Attorneys for Plaintiffs

/s/ Timothy J. McGinn

Derick C. Albers (MO #60966)

LEWIS RICE LLC

600 Washington Avenue, Suite 2500

St. Louis, MO 63101

(314) 444-7649

dalbers@lewisrice.com

Timothy J. McGinn (admitted *pro hac vice*)

Becky N. Saka (admitted *pro hac vice*)

Alyssa Chamberlin (admitted *pro hac vice*)

GUNSTER, YOAKLEY & STEWART, P.A.

600 Brickell Avenue, Suite 3500

Miami, FL 33131

(305) 376-6000

tmcginn@gunster.com

bsaka@gunster.com

achamberlin@gunster.com

***Attorneys for Defendants The Keyes Company and
Illustrated Properties, LLC***

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

/s/ Timothy J. McGinn

Timothy J. McGinn

*Attorney for Defendants The Keyes Company and
Illustrated Properties, LLC*